
From: James O'Brien <jobrien@bwoattorneys.com>
Sent: Wednesday, May 10, 2023 11:36 AM
To: Grant Rahmeyer <grant@rah.law>
Cc: Norman Rouse <nrouse@cwrcave.com>; dan@ramsdelllaw.com; Megan Grimes <mgrimes@bwoattorneys.com>;
James O'Brien <jobrien@bwoattorneys.com>
Subject: RE: Ramsdell Bankruptcy

Mr. Rahmeyer, this is in follow up to our conversation of this date regarding my subpoena to you and your law firm. The subpoena calls for testimony and production of requested documents on May 12, 2023. As I understand it, you are declining to produce and of the requested documents, which include (a) any documents regarding representation of clients and division of fees by both you and your law firm, on the one hand, and Daniel Ramsdell and Ramsdell Law Firm, on the other hand; and (b) any documents relating to the settlement of the Fowler bad faith litigation in St. Louis City Circuit Court, that was recently approved by the Circuit Court. You are asserting confidentiality as to the Fowler settlement, and attorney client privilege as to the documents relating to representation of clients and division of fees between your firm and Ramsdell Law Firm. Under these circumstances, there is no point in going forward with the deposition that is noticed for Friday, May 12, 2023.

I have informed you that I intend to file a Motion to Compel with the Bankruptcy Court to seek production of these documents. I intend to do that promptly. You have indicated that you will abide by the Court's ruling on such a motion. For the record, we would be willing to execute a protective order to prevent dissemination of the documents. If you reconsider and are willing to comply with the subpoena, let me know. Otherwise, we will file a Motion to Compel no later than Friday, May 12, 2023.

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